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7 Counsel for Defendant ISAAC

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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,

16 Case No. 19-31 WHO

17 Plaintiff,

18 **STIPULATION AND [PROPOSED]**
19 **ORDER**

20 v.

21 TOMMY ISAAC,

22 Defendant.

23 The defense respectfully requests a further continuance of sentencing of approximately 30 days.

24 The defense previously requested an additional 60 days because the sentencing conflicted with a trial set
25 for earlier this year. The Court granted a continuance to March 26, 2025. Unfortunately, undersigned
26 counsel was obligated to request a brief continuance of that trial, which was granted by Judge Illston;
27 however, the trial was continued to a date that conflicts with sentencing in this matter (defense counsel
28 unsuccessfully requested an alternative trial date that did not conflict with this hearing). Opening
statements are on March 17, 2025, and the parties anticipate a three-week trial. Accordingly, defense
counsel requests that this sentencing be continued 30 days to April 23, 2025. Although Mr. Isaac is in
custody, the continuance will not impact his sentence given the defense's anticipated recommendation.
The government and Probation have no objection. Neither party anticipates any further continuances.

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1 IT IS SO STIPULATED.
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March 4, 2025
Dated

4 /S
5 DAVID W. RIZK
6 RIZK & SHEARER LLP
7 Counsel for Mr. Isaac
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10 March 4, 2025
11 Dated

12 PATRICK ROBBINS
13 Acting United States Attorney
14 Northern District of California
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17 /S
18 JEFFREY BORNSTEIN
19 Assistant United States Attorney
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IT IS SO ORDERED.

18 Dated

19 WILLIAM H. ORRICK
20 Senior United States District Judge
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